

1068557

SPECIAL 510(K) PREMARKET SUMMARY

Peak™ Bond

DEC 12 2006

This summary of the Special 510(k) substantial equivalence information is being submitted in accordance with the requirements of 21 CFR 807 for Peak™ Bond.

Applicant's Name and Address:

Ultradent Products, Inc.
505 West 10200 South
South Jordan, UT 84095

Telephone Number:	(801) 553-4491
Fax Number:	(801) 553-4609
Contact Person:	Diane Rogers, R/A Product Specialist
Date Summary Prepared	November 15, 2006

Name of the Device:

Trade name:	Peak™ Bond
Common Name:	Bonding Resin
Classification Name:	Agent, Tooth Bonding, Resin
Risk Class:	II, (21 CFR 872-3200)
Classification Product Code:	76KLE

Legally Marketed Predicate Devices to which Equivalence is Claimed:

Predicate: **PQ1®**/ Ultradent Products, Inc. /K023042 Manufactured and distributed by Ultradent Products, Inc. 505 West 10200 South, South Jordan, Utah 84095.

Product Comparison

Product	<i>Peak™ Bond</i>	<i>PQ1®</i>
Intended Use	Use for most bonding needs in restorative dentistry. Peak™ Bond is formulated to work well with flowable composite for light cure luting.	Same
Bonding	Peak™ Bond bonds to the following materials: Dentin and enamel Porcelain Metal Composite	Same
Description	Single resin bonding agent	Same
Biocompatibility and Safety	Passed cytotoxicity testing	Same
Properties	Radiopaque, light curing	Same

Device Description and Performance Characteristics:

Peak™ Bond is a single syringe delivered, single component resin bonding system. It is a light curing bonding agent with an ethyl alcohol solvent carrier. It will cure with most all lights (not laser). Peak™ Bond is 7.5% filled and is radiopaque.

Intended Use:

Peak™ Bond is used for most bonding needs in restorative dentistry. It is formulated to work well with flowable composites for light cure luting. Peak™ Bond bonds to the following materials:

Dentin and enamel
Porcelain
Metal
Composite

Technological Characteristics:

Peak™ Bond is a single resin-bonding agent that provides high bond strength and helps prevent micro leakage. It's unsurpassed filler penetration into dentin tubules helps minimize sensitivity. It is radiopaque, has an ethyl alcohol carrier, cures with all lights and is used with light curing indirect bonding.

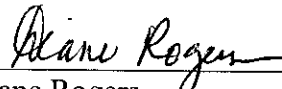
Peak Bond's unique and patented chemistry bonds to dentin/enamel, cast metal, porcelain and composite. It is also effective for indirect procedures where light curing is possible.

Brief Description of Testing Performed and Conclusion:

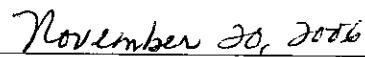
Peak™ Bond was tested and compared to its predicate, PQ1, Ultradent Products, Inc. in the following categories: Intended Use, Description, Biocompatibility and Safety, Properties, Ease of Use, % Filled, Ingredients, Radiopacity, Shrinkage and Bond Strength. All of our testing concluded that Peak™ Bond has met or exceeded our testing expectations. It is simply a thinner version of our PQ1.

Substantial Equivalence

In conclusion, Peak™ Bond, that is to be manufactured and marketed by Ultradent products, Inc., 505 West 10200 South, South Jordan, Utah 84095, is substantially equivalent to our PQ-1 which, for the most part is the same material, the same intended use, and are equally safe for the indications as described. Please feel free to contact us for further explanation and dialogue with respect to this product, as it is our understanding that the product is substantially equivalent to products legally marketed for this indication. We can be reached for discussion at the number listed above and we would appreciate the opportunity to further clarify as necessary.



Diane Rogers
Regulatory Affairs Product Specialist



Date



Food and Drug Administration
9200 Corporate Boulevard
Rockville MD 20850

Ms. Diane Rogers
Regulatory Affairs Product Specialist
Ultradent Products, Incorporated
505 West 10200 South
South Jordan, Utah 84095

DEC 12 2006

Re: K063557
Trade/Device Name: Peak™ Bond
Regulation Number: 21 CFR 872.3200
Regulation Name: Resin Tooth Bonding Agent
Regulatory Class: II
Product Code: KLE
Dated: November 21, 2006
Received: November 30, 2006

Dear Ms. Rogers:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Page 2 – Ms. Diane Rogers

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (240) 276-0115. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (240) 276-3150 or at its Internet address <http://www.fda.gov/cdrh/industry/support/index.html>.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Chiu S. Lin', with a stylized flourish at the end.

Chiu S. Lin, PhD

Director

Division of Anesthesiology, General Hospital,
Infection Control and Dental Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

Indications for Use

510(k) Number (if known): K063557

Device Name: PeakTM Bond

Indications for Use:

Use for most bonding needs in restorative dentistry. PeakTM Bond is formulated to work well with flowable composite for light cure luting. Ultradent recommends the PermaFlow[®] DC system using chemical cure PermaFlow[®] DC primer for chemical cure/dual core bonding (e.g., non-translucent veneers, inlays, and post bonding).

PeakTM Bond bonds to the following materials:

- Dentin and enamel
- Porcelain
- Metal
- Composite

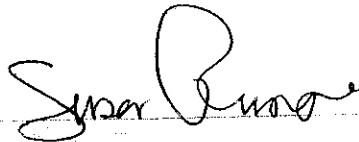
Prescription Use X
(21 CFR Part 801 Subpart D)

AND/OR

Over-The-Counter Use
(21 CFR Part 807 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)



Special Representative, General Public Use,
Office of Device Evaluation, CDRH

Device Name: PeakTM Bond